



October 11, 2012

United States Environmental Protection Agency
Ariel Rios Building, Mail Code 2254A
International Compliance Assurance Division
Attn. Scott Nelson
1200 Pennsylvania Avenue NW
Washington DC 20460

Subject: Revised 2009 EPA Hazardous Waste Export Shipment Report

Dear Mr. Nelson:

On March 21, 2012, Badger Disposal of WI., Inc. received a Request of Information letter from the EPA Region 5 in regards to our submitted 2009 Hazardous Waste Export Shipment Report. Badger Disposal responded to the request of information and provided additional information to the EPA regarding a calculation error on the 2009 report.

On September 17, 2012 Badger Disposal received a Notice of Violation from the EPA Region 5 regarding 2 requirements. In discussions with Michael Cunningham of the EPA Region 5, it was determined that the corrective action required would be to resubmit a revised 2009 Hazardous Waste Export Shipment Report with corrections made to fulfill the requirements that were identified. Following is the response to the Notice of Violation letter sent to Badger Disposal regarding our 2009 Hazardous Waste Export Shipment Report to the EPA Region 5. The revised report is attached.

I would like to thank you your assistance in this matter. If you have any further questions regarding this revision, I can be reached at (414)760-9175 ext 222 or via email at ronm@badgerdisposal.com.

Sincerely,
Badger Disposal of WI., Inc.

Ron Mitchell
General Manager



5611 W. Hemlock St. Milwaukee, WI 53223

866-271-0961 • 414-760-9175 • Fax: 414-760-9189 • www.badgerdisposal.com



October 11, 2012

United States Environmental Protection Agency
Region 5
Attn. Michael Cunningham
77 West Jackson Boulevard
Mail Code LR-8J
Chicago, IL 60604-3590

Subject: Notice of Violation

Dear Mr. Cunningham:

Following is the response to the Notice of Violation letter sent to Badger Disposal of WI., Inc. regarding our 2009 Hazardous Waste Export Report to the EPA.

Badger Disposal of WI., Inc. has sent a revised copy of our 2009 EPA Hazardous Waste Export Shipment Report to the EPA International Compliance Assurance Division to address the two violations listed in the Notice of Violation.

Requirement 1:

The amount of Waste Corrosive Liquid(UN3264) listed in Badger's 2009 Primary Exporter of Hazardous Waste Annual Report has been corrected to 11,495 pounds.

Requirement 2:

The Waste Environmentally Hazardous Substances Liquid, N.O.S. (sodium sulfide)UN3082 has been added to Badger's 2009 Primary Exporter of Hazardous Waste Annual Report. The amount reported is 583 pounds. Since this amount was originally reported under the Waste Environmentally Hazardous Substances Solid UN3077 portion of the report I have revised the amount reported under this waste shipping name to 6,219 pounds.

I have contacted Scott Nelson of the US EPA International Compliance and Assurance Division in Washington DC regarding the submission of a revised 2009 Primary Exporter of Hazardous Waste Annual Report and have copied him on this response to the Notice of Violation.

If you have any further questions regarding this issue or the response to this Notice of Violation, I can be reached at (414)760-9175 ext 222 or via email at ronm@badgerdisposal.com.

Sincerely,
Badger Disposal of WI., Inc.

A handwritten signature in cursive script, appearing to read "Ron Mitchell".

Ron Mitchell
General Manager

Cc: Patricia Chabot, WDR
Scott Nelson USEPA

2009 EPA Hazardous Waste Export Shipment Report

Badger Disposal of WI., Inc.
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

EPA ID No.: WID988580056

Waste Description	Shipping Name	Class	(UN/NA)
12833 Cyanide Solutions	RQ, Waste Cyanide Solutions n.o.s.	6.1	UN1935
EPA Waste No.	D003, F009,D002,F007,D011,D006,D007,D008,P029,P098		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments	4	Total Volume: 67,846 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
12832 Cyanide Solids	RQ, Waste Cyanides, Solid,Inorganic,n.o.s	6.1	UN1588
EPA Waste No.	D003,P029,P098,F011,F007,D002,D007,D008		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	3	Total Volume: 6,732 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
19156 Cyanide Liquid	RQ, Waste Toxic Liquids, Inorganic,N.O.S.	6.1	UN3287
EPA Waste No.	D004,P012,P011,P087,P114,P010,D010,D003,D008,D006, P098,P106,P029,P104,D007,D011,D005,U204,F007,P030		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	3	Total Volume: 2,977 lbs	

Waste Description	Shipping Name	Class	Code (UN/NA)
13189 Oxidizer Solid	RQ, Waste Oxidizing Solid, N.O.S.	5.1	UN1479
EPA Waste No.	D001,D005,D006,D007,D008,D011,D003,D002		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	4	Total Volume: 11,119 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
12830 Acid Liquid	RQ, Waste Corrosive Liquids, Toxic, N.O.S.	8 (6.1)	UN2922
EPA Waste No.	D002,U134,D004,D006,D007,D008,D009,D010,D011, U204,F008		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume: 2,198 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
13187 Oxidizing Solid	RQ, Waste Oxidizing Solid, Corrosive, N.O.S.	5.1 (8)	UN3085
EPA Waste No.	D002,D001,D007		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume: 5,729 lbs	

Waste Description	Shipping Name	Class	(UN/NA)
013198 Oxidizing Liquid	RQ, Waste Oxidizing Liquid, Corrosive. N.O.S.	5.1(8)	UN3098
EPA Waste No.	D001.D002,D004,D005,D006,D007,D008,D011		
Transporter:	Freehold Cartage, Inc.	EPA ID No. NJD054126164	
Consignee:	Stablex Canada, Inc.		
Total Shipments:	2	Total Volume: 1,079 lbs	

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
012831 Oxidizing Liquid	RQ, Waste Corrosive Liquid, Oxidizing, N.O.S.	8(5.1)	UN3093
EPA Waste No.	D002,D001		
Transporter:	Freehold Cartage, Inc.	EPA ID No.	NJD054126164
Consignee:	Stablex Canada, Inc.		
Total Shipments:	3	Total Volume:	9,887 lbs

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
12830 Acid Liquid	RQ, Waste Corrosive Liquids, N.O.S.	8	UN3264
EPA Waste No.	D002,D007		
Transporter:	Freehold Cartage, Inc.	EPA ID No.	NJD054126164
Consignee:	Stablex Canada, Inc.		
Total Shipments:	1	Total Volume:	11,495 lbs

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
13196 Neutral Solid	RQ, Waste Sodium Sulfide	8	UN1849
EPA Waste No.	D002,D003		
Transporter:	Freehold Cartage, Inc.	EPA ID No.	NJD054126164
Consignee:	Stablex Canada, Inc.		
Total Shipments:	1	Total Volume:	57 lbs

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
012832 Cyanide Solid	RQ, Waste Toxic Solid, Inorganic,N.O.S.	6.1	UN3288
EPA Waste No.	D003,D006,D007,F009,D006,D011,F006		
Transporter:	Freehold Cartage, Inc.	EPA ID No.	NJD054126164
Consignee:	Stablex Canada, Inc.		
Total Shipments:	3	Total Volume:	5,724 lbs

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
012833 Cyanide Liquid	RQ, Waste Toxic Solid, Corrosive	6.1(8)	UN3289

Inorganic, N.O.S.

EPA Waste No. F009,D002,D008,D011

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 2 Total Volume: 3,238 lbs

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
12887 Neutral Solid	Waste Environmentally Hazardous	9	UN3077

Substances, Solid, N.O.S.

EPA Waste No. D003,F007,F008

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 2 Total Volume: 6,219 lbs

<u>Waste Description</u>	<u>Shipping Name</u>	<u>Class</u>	<u>(UN/NA)</u>
12886 Neutral Liquid	Waste Environmentally Hazardous	9	UN3082

Substances, Liquid, N.O.S.

EPA Waste No. D003

Transporter: Freehold Cartage, Inc. EPA ID No. NJD054126164

Consignee: Stablex Canada, Inc.

Total Shipments: 1 Total Volume: 583 lbs

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Signature: Ken Mitchell

Date: October 10, 2012

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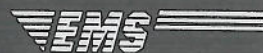
FROM: (PLEASE PRINT) PHONE ()

Badger Disposal of WI Int.
Kon Mitchell
Milwaukee WI 53223

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